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October 12, 2023

VIA ECF

Hon. John G. Koeltl  
United States District Judge  
Southern District of New York  
500 Pearl Street, Courtroom 1A  
New York, NY 10007

*Conference adjourned to  
10/23/23 at 3:00 P.M.  
SO ordered. J.G.B./K.B.T.  
U.S.D.S.  
10/13/23*

Re: SOL-MM III LLC v. JPMorgan Chase Bank, N.A., et. al.,  
No. 1:23-cv-06479 (JGK)

Dear Judge Koeltl:

We represent Defendants New WEM Holdings Affiliate 1 Ltd., New WEM Holdings Affiliate 2 Ltd., New WEM Holdings Ltd. and MOA Holdings III, LLC (collectively, the “WEM-MOA Guarantors”) in the above-referenced action. We write to request an adjournment of the pre-motion telephone conference currently scheduled for Monday, October 23 at 11:30 a.m. (See Order, ECF 27) to October 23 after 3 p.m. or a different date that week. All parties consent to this request for an adjournment and no prior request has been made.

Counsel for the WEM-MOA Guarantors has a pre-existing commitment to appear at a virtual hearing in California Superior Court, Los Angeles (Hon. Elaine Lu) on the same date and at the same time as the telephone conference ordered by this Court yesterday. We have conferred with counsel for Plaintiff and our co-Defendants and all parties are amenable to moving the conference to 3 p.m. EDT or later on October 23, subject to Your Honor’s availability. If the Court is not available after 3 p.m. on October 23, all parties are also available on October 24 from 2:30-4 p.m. or on October 25 10:30 a.m.-12:00 p.m. The requested adjournment does not affect any other scheduled dates as the Order states that the Court will set any subsequent deadlines at the conference.

**KASOWITZ BENSON TORRES LLP**

Hon. John G. Koeltl., U.S.D.J.

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Respectfully submitted,

*/s/ Sheron Korpus*

cc: All Counsel of Record (via ECF)